

SUPPLEMENTAL URGENCY NOTICE – Emergency TRO Request

To: United States District Court, Eastern District of Pennsylvania

From: Brandon Grossinger, Pro Se Plaintiff

Subject: Urgent Grounds for Emergency Temporary Restraining Order (TRO) – ADA + USDA EQIP Interference

This supplemental statement supports Plaintiff's previously submitted Emergency Motion for TRO by emphasizing the specific, documented harms that meet the Winter v. NRDC standard for federal injunctive relief.

Immediate and irreparable harm exists due to the following circumstances:

- Plaintiff is the Executive Director of Bunny's Flowers, a 501(c)(3) nonprofit with a signed USDA EQIP grant contract active through 2029.
- The landowner (Mark Lichty) signed the contract and is now obstructing access, issuing a vacate demand with no viable relocation or time allowance.
- Plaintiff lives with a documented neurological disability (Lyme disease, ADA-covered) and is undergoing vocational rehabilitation (OVR) and medical care.
- Loss of access will prevent compliance with federal conservation grant obligations, destroy program continuity, and jeopardize farm infrastructure.
- The landowner's reversal occurred after disclosure of disability and USDA funding approval, suggesting retaliation.
- Driveway flooding and misinformation about site conditions were reported to USDA and further demonstrate obstruction.

Plaintiff respectfully requests urgent judicial review of this emergency matter. Relief is sought not only to preserve medical access and nonprofit operations, but to uphold federal contracts and protect the public interest.

Respectfully submitted,

Brandon Grossinger

Pro Se Plaintiff & Executive Director, Bunny's Flowers

(215) 534-2451

bunnysflowersus@gmail.com